

"I will stand for my client's rights.
I am a trial lawyer."
—Ron Motley (1944–2013)

February 26, 2019

National Freedom of Information Officer
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (2822T)
Washington, DC 20460

Re: FOIA Request

To Whom It May Concern:

Pursuant to the Freedom of Information Act, I would like to request the following documents on behalf of my client, the Government of the United States Virgin Islands, in connection with its ongoing litigation, *The Gov't of the U.S.V.I. v. The Servicemaster Co., LLC, The Terminix Int'l Co. Ltd. P'ship, and Terminix Int'l USVI, LLC*, No. SX-16-CV-700 (V.I.):

Any documents, including, but not limited to, documents that companies produced to the EPA pursuant to subpoena or otherwise, relating to Superior Angran, Superior Angran Caribbean, ServiceMaster Company, LLC, ServiceMaster BSC LLC, Terminix International Company Limited Partnership, Terminix International USVI, LLC and involving the use of methyl bromide, any other fumigation chemicals, including, but not limited to, Vikane, and any other issues relating to fumigation and/or fumigation practices. This request includes, but is not limited to, the matters listed below and any related investigatory materials:

- *U.S. v. The Terminix International Company Limited Partnership, et al.*, No. 3:16-cr-00010-CVG-RM (D.V.I.)
- *U.S. v. The Terminix International Company Limited Partnership, et al.*, No. 3:17-cr-00007-CVG-RM (D.V.I.)
- *In the Matter of Superior-Angran LLC et al.*, Docket No. CAA-02-2016-1204 (E.A.D.)
- *In the Matter of Terminix International Company*, Docket No. FIFRA-09-2018-0006 (E.A.D.)
- *In the Matter of Vertut Blending and Packaging Site*, Docket No. CERCLA-04-2009-3818 (E.A.D.)

Letter from Liu to EPA
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Sincerely,

/s/ Mimi Liu
Mimi Liu

CC: Carol Thomas-Jacobs, Acting Attorney General, Virgin Islands Department of Justice,
Office of the Attorney General